

NICHOLAS M. WOOLDRIDGE, ESQ.  
Nevada Bar No.:8732  
WOOLDRIDGE LAW LTD.  
400 South 7<sup>th</sup> Street, Suite 400  
Las Vegas, NV 89101  
Telephone: (702) 623-6362  
Facsimile: (702) 359-8494  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL FERNANDEZ,  
Plaintiff,

vs.

Case No.: 2:23-cv-01843

CLARK COUNTY SCHOOL DISTRICT, a political subdivision of Clark County, State of Nevada, Dr. JESUS F. JARA, Superintendent of the Clark County School District, his individual and official capacity, CLARK COUNTY, a political subdivision of the State of Nevada, CLIEDA LLANES individually and in her official capacity as head custodian, Snyder Elementary School, Clark County School District, CHRISTINE VASQUES, individually and in her capacity as principal, Blue Diamond Elementary School, Clark County School District, CLARK COUNTY SCHOOL DISTRICT POLICE DEPARTMENT, a political subdivision of Clark County, State of Nevada, MIKE BLACKEYE, Chief of Police of the Clark County School District, in his individual and official capacity, OFFICER B. CHAPLIN P # 581, individually and in his capacity as Police Officer, CCSDPD, OFFICER I. CAMPOS P #533, individually and in his capacity as Police Officer, CCSDPD, DOES 1-100, JOHN DOES 1 through 100, inclusive; and ROE ENTITIES 1 through 100,

Defendants.

**AMENDED DISCOVERY PLAN AND  
SCHEDULING ORDER; SPECIAL  
SCHEDULING REVIEW REQUESTED**

The parties conducted the Rule 26(f) conference on December 14, 2023. The parties now submit their ~~proposed~~ discovery plan and scheduling order in compliance with LR 26-1(b).

- 1) **Discovery Cut-Off Date.** The Defendants answered or otherwise appeared on November 17, 2023. The ~~proposed~~ discovery cut-off date is November 15, 2024.
- 2) **Amended Pleadings and Adding Parties:** Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties is August 16, 2024 *[insert date 90 days before the discovery cut-off date]*.
- 3) **Expert and Rebuttal-Expert Disclosures.** The deadline to disclose experts September 16, 2024 *[insert date 60 days before the discovery cut-off date]*. The deadline to disclose rebuttal experts is October 16, 2024 *[insert date 30 days before the discovery cut-off date]*.
- 4) **Dispositive Motions.** The deadline to file dispositive motions is December 16, 2024 *[insert date 30 days after the discovery cut-off date]*.
- 5) **Pretrial Order.** The deadline to file a pretrial order is January 15, 2024 *[insert date 30 days after the dispositive-motion deadline]*.
- 6) **Fed. R. Civ. P. 26(a)(3).** The disclosures required by this rule and any objections to them must be included in the joint pretrial order. *[Unless the parties stipulate otherwise in this ~~proposed~~ discovery plan and scheduling order and the court so orders.]*
- 7) **Alternative Dispute Resolution.** The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.
- 8) **Alternative Forms of Case Disposition.** The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
- 9) **Electronic Evidence.** The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations. *[Applies only in cases in which a jury trial has been demanded. If applicable, state any stipulations the parties]*

reached regarding providing discovery in an electronic format compatible with the court's electronic jury evidence display system.]

**10) Reason for Request for Extended Discovery Deadlines.**

The standard discovery deadlines are insufficient due the extensive discovery that needs to be completed in this matter and due to the specific individuals and entities that will likely need to respond to Plaintiff's discovery requests. Specifically, Plaintiff intends to conduct the following discovery requests:

No.	Discovery Item	Notes on Discovery Item
1	FRCP 30(b)(6) Deposition of Clark County School District.	This deposition will also require a meet and confer between the parties prior to the deposition pursuant to FRCP 30(b)(6). Further, it is anticipated that Defendant will need substantial time to access and select the proper deponents based on Plaintiff's examination items.
2	Written Discovery to Clark County School District.	It is anticipated that Defendant will need more than the standard 30 days to secure the correct answers and documents to discovery due to the complex nature of the Clark County School District.
3	Deposition of Cleida Llanes	N/A
4	Written Discovery to Cleida Llanes	N/A
5	Deposition of Christine Vasques	Upon information and belief of Plaintiff, this Defendant is still an

		active principle at Blue Diamond ES. It is anticipated by the parties that discovery responses, and subsequently, the deposition may be delayed due the job duties of this Defendant.
6	Written Discovery of Christine Vasques	Upon information and belief of Plaintiff, this Defendant is still an active principle at Blue Diamond ES. It is anticipated by the parties that discovery responses, and subsequently, the deposition may be delayed due the job duties of this defendant.
7	Deposition of Officer B. Chaplin	Both parties will need to accommodate the individual schedules of this defendant. However, no issues are anticipated at this time regarding this deposition.
8	Written Discovery to Officer B. Chaplin	Both parties will need to accommodate the individual schedules of this defendant. However, no issues are anticipated at this time regarding this deposition.
9	Deposition of Officer I. Campos	Both parties will need to accommodate the individual schedules of this defendant. However, no issues are

		anticipated at this time regarding this deposition.
10	Written Discovery to Officer I. Campos	Both parties will need to accommodate the individual schedules of this defendant. However, no issues are anticipated at this time regarding this deposition.
11	Disclosures of Initial Experts	<b>Under standard discovery deadlines, initial experts would be due on approximately March 15, 2024.</b> The determination on experts must be made based on the discovery received in at least some of the depositions taken above. Completely such a task in 3 months would simply not be achievable. However, the <del>proposed</del> deadline of August 16, 2024 is a target that can be accomplished if all the parties act diligently in discovery.
12	Deposition of any disclosed Experts	N/A

In addition, it is expected that Defendant will seek to take the deposition of Plaintiff as well as submit written discovery. That being said, it is also anticipated that Defendant plans on filing early Motions to Dismiss. This Motion will likely aim to have multiple parties and claims dismissed. Such motions will likely also be highly controlling what discovery topics are relevant. An extended time frame in discovery will allow for these motions to be handled and not require

1  
2 the parties to request another discovery extension assuming that the motions are handled in a timely  
3 fashion.

4 In summary, many of the party Defendants are governmental entities and the party Defendants  
5 that are being sued in their individual capacity work for governmental agencies. Due the multiple  
6 Defendants in this case, it is expected that both written discovery and depositions will require more  
7 than three months to complete<sup>1</sup>. It is also important for Plaintiff to complete a significant portion  
8 of this discovery to help Plaintiff determine if an expert will be needed (and which one) to attempt  
9 to prove Plaintiff's claims; the same can be said for Defendants' defenses. Lastly, the parties  
10 anticipate a large round of dispositive motions to be filed by Defendants. The determination of  
11 these motions will tailor the discovery needs of the parties moving forward. An extended discovery  
12 schedule would accommodate these motions as well. As such, the above request is made for a  
13 special discovery order.  
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28 <sup>1</sup> Even if these discovery tasks were completed by March 15, 2024, that would provide no time for a determination to be made for experts as usually this process begins no later than 60 days prior to the deadline due to the report requirement for experts.

IT IS SO STIPULATED

WOOLDRIDGE LAW LTD.

OFFICE OF THE GENERAL COUNSEL

/s/ Nicholas M. Wooldridge, Esq.

/s/ David R. Hall, Esq.

Nicholas M. Wooldridge, Esq.  
Nevada Bar No.: 8732  
400 S. 7<sup>th</sup> Street, Suite 400  
Las Vegas, Nevada 89101  
*Attorney for Plaintiff*

David R. Hall, Esq.  
Nevada Bar No.: 6333  
5100 W. Sahara Avenue  
Las Vegas, Nevada 89146  
*Attorney for Defendants*

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

Date: January 4, 2024